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August 1, 2013

Hon. Michael A. Hammer, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: White v. Smiths Group, plc, et al.
Civil Action No. 2:10-4078 (KM/MAH)

Dear Judge Hammer:

Your Honor's Order of July 22, 2013 (ECF No. 163) instructed the parties to continue discussions pertaining to two discovery disputes. We are to report to Your Honor in a joint letter on Monday, August 5, 2013 our attempts at resolution and the respective party's reasoning why the response is or is not deficient.

The parties have conferred and are still engaged in discussions. We agree that we need additional time to discuss the issues and determine whether we will reach a resolution or narrow the dispute. All parties request an extension of two weeks, until August 19, 2013, to submit the Joint Letter.

Thank you, Your Honor, for your consideration.

Very truly yours,
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

By: s/ Ellen O'Connell
Ellen O'Connell

cc: John Lee, Esq. (via email)
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Melvyn Bergstein, Esq. (via email)